

CAUSE NO. 2020-CI-12601

Exhibit G

ANDREA JOHNSON
Plaintiff,

v.

JAIPERSAD GILDHARRY, ET AL
Defendants.

§
§
§
§
§
§
§

IN THE DISTRICT COURT

57th JUDICIAL DISTRICT

BEXAR COUNTY, TEXAS

MOTION FOR RULE 106 ALTERNATE SERVICE

This Motion for Alternate Service is brought by, **ANDREA JOHNSON**, Plaintiff, who shows in support:

I.

Service has been attempted unsuccessfully on JAIPERSAD GILDHARRY, as shown in the attached affidavits, which are incorporated by reference as if fully set forth at length, as Exhibit “A”.

II.

Reasonably effective notice of the suit may be given to JAIPERSAD GILDHARRY, by having any person authorized by Rule 103 of the Texas Rules of Civil Procedure leave a true copy of the citation, with a copy of the petition attached, with anyone over sixteen years of age at the location specified in the attached affidavit of the authorized process server, or by taping a true copy of the citation, with a copy of the petition attached, to the front door or gate at the place of residence and/or last known address, at the address in the Process Server’s affidavit, **2114 N. 43rd Ave., Hollywood, FL 33021**.

Defendant Jaipersad Gildharry answered his phone when called by the process server, he responded with “Talk to my attorney,” requested not to be contacted again, and disconnected the line.

Counsel for Defendant SE Delivery Services has stated they do not represent Defendant Gildharry and declined accepting service on his behalf.

The undersigned conferred with counsel for Defendant SE Delivery Services regarding the instant motion. The undersigned did not receive a position from Defendant SE Delivery Services aside from the aforementioned confirmation that they do not represent Defendant Gildharry.

WHEREFORE PREMISES CONSIDERED, MOVANT, ANDREA JOHNSON, prays that the Court grant this Motion for Alternate Service, and for general relief.

Respectfully submitted,

HILLEY & SOLIS, P.L.L.C.
6243 W. Interstate 10, Suite 503
San Antonio, Texas 78201
210.446.5000 Telephone
210.446.5001 Telecopier

By: 

CARLOS A. SOLIS
State Bar No. 24060636
csolis@hilley-solis.com

DEREK HILLEY
State Bar No. 24056770
dhilley@dhilley.com

ATTORNEYS FOR PLAINTIFF
ANDREA JOHNSON

CAUSE NO. 2020-CI-12601

ANDREA JOHNSON	§	IN THE DISTRICT COURT
Plaintiff,	§	
	§	
v.	§	57 th JUDICIAL DISTRICT
	§	
JAIPERSAD GILDHARRY, ET AL	§	
Defendants.	§	BEXAR COUNTY, TEXAS

ORDER ON MOTION FOR ALTERNATE SERVICE

On this day the Court considered the Motion for Alternate Service of ANDREA JOHNSON and ORDERS that service on JAIPERSAD GILDHARRY be effected by any person authorized by Rule 103 of the Texas Rule of Civil Procedure by leaving a copy of the citation with pleadings and orders attached with anyone over sixteen years of age at the location specified in the attached affidavit, or by taping a true copy of the citation, with a copy of the petition attached, to the front door or gate at the place of residence and/or last known address, at the address in the Process Server's affidavit, at **2114 N. 43rd Ave., Hollywood, FL 33021**. Proof of Service shall be made by the person executing the return, stating when the citation was served, on whom it was served, and where it was served.

ORDERED on this, the _____ day of December 2020.

JUDGE PRESIDING

APPROVED AS TO FORM:



CARLOS A. SOLIS

State Bar No. 24060636

csolis@hilley-solis.com

DEREK HILLEY

State Bar No. 24056770

dhilley@dhilley.com

HILLEY & SOLIS, P.L.L.C.

6243 W. Interstate 10, Suite 503

San Antonio, Texas 78201

210.446.5000 Telephone

210.446.5001 Telecopier

ATTORNEYS FOR PLAINTIFF

ANDREA JOHNSON

RETURN OF NON-SERVICE

State of Texas

County of Bexar

District Court

Case Number: 2020CI12601

Plaintiff:

Andrea Johnson

vs.

Defendants:

Jaipersad Gildharry And Se Independent Delivery, LLC

For:

CARLOS ADRIAN SOLIS

6243 W INTERSTATE 10

STE 503

SAN ANTONIO, TX 78201

Received by Front Range Legal Process Service on the 16th day of October, 2020 at 6:20 pm to be served on Jaipersad Gildharry.

I, Jacqueline Garcia, do hereby affirm that on the 13th day of November, 2020 at 5:00 pm, I:

NON-SERVED the Citation; Plaintiff's Original Petition TRCP 193.7 Notice Of Self-Authentication TRCP194.2 Requests For Disclosure for the reasons detailed in the comments below.

Additional Information pertaining to this Service:

10/20/2020 10:35 am Attempted Service at 2114 N 43rd Ave., Hollywood, FL 33021. Advised that Jaipersad is working in Texas. Please advise.

10/26/2020 1:42 pm Attempted Service at 3841 W State Road 84, Unit 204, Davie, FL 33312. This address does not exist.

11/4/2020 6:25 pm Attempted Service at 2114 N 43rd Ave. Hollywood, FL 33021. The blue Mitsubishi Mirage was in the carport. There were no other vehicles. Spoke with mother who advised that Jaipersad was still in Texas.

11/13/2020 9:40 am Attempted Service AT 2114 N 43rd Ave., Hollywood, FL 33021. There were no vehicles in the driveway or carport, the blinds were closed and there was no answer at the door.

Under penalty of perjury, I swear or affirm, pursuant to Fla. Stat 92.525 that I have read the foregoing and the facts stated there are true. I am over the age of 18, have no interest in the above action, and am a Special Process Server, in good standing, in the judicial circuit in which the process was served.


Jacqueline Garcia
SPS #1449

Front Range Legal Process Service
145 West Swallow RD
Ft. Collins, CO 80525
(888) 387-3783

Our Job Serial Number: FRS-2020006608

CAUSE NO. 2020CI12601

ANDREA JOHNSON	§	IN THE DISTRICT COURT
	§	
v.	§	57 th JUDICIAL DISTRICT
	§	
JAIPERSAD GILDHARRY, ET AL	§	BEXAR COUNTY, TEXAS

AFFIDAVIT OF ATTEMPTED PERSONAL SERVICE

Aaron Woodward appeared in person before me today and stated under oath: "My name is Aaron Woodward; I am a private process server and licensed Private Investigator in the State of Texas. My company license number is A18888. I am over the age of eighteen years, and I am fully competent to make this affidavit. The facts stated in this affidavit are within my personal knowledge and are true and correct.

"I attempted to serve **Jaipersad Gildharry** ("Subject") with the following documents, in this case personally at the address and on the days shown below:

The following came to hand on August 13, 2020 at 1505 hours:


- a) Citation;
 - b) Plaintiff's Original Petition TRCP 193.7 Notice of Self-Authentication TRCP 194.2 Requests for Disclosure
-
- 1) On October 1, 2020 at 1510 hours I attempted service on the Subject at the address located in the Petition: **6922 N. Interstate 35, San Antonio, Texas 78218**. The forgoing address belongs to a Woodsprings Suites, where I spoke with a female at the front desk. She confirmed that the Subject moved out of the property over a year ago.
 - 2) After speaking with the front desk associate, I ran a skip trace on the Subject, which resulted in a last known address of: **2114 N. 43rd Avenue, Hollywood, Florida 33021**, and telephone number (561) 396-6953. I contacted the subject at the preceding number. The Subject said to call his attorney and to not to call him back, then immediately terminated the phone call.

"I am qualified to serve process in this case as required under the Tex. R. Civ. P."

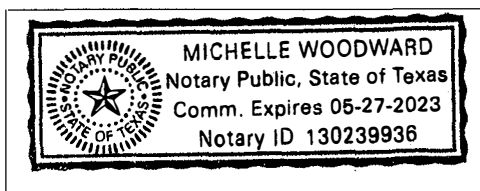


Aaron Woodward - TX PSC 10397 Exp 6/30/21

SIGNED under oath before me on this, the 2nd day of **December** 2020.



Notary Public, State of Texas



CAUSE NO: 2020CI12601

ANDREA JOHNSON
Plaintiff

VS.

JAIPERSAD GILDHARRY AND
SE INDEPENDENT DELIVERY,
LLC
Defendants

§
§
§
§
§
§
§
§

IN THE DISTRICT COURT

57th JUDICIAL DISTRICT

BEXAR COUNTY, TEXAS

NOTICE OF HEARING

We humbly request a hearing on Plaintiff's Motion for Rule 106 Alternate Service for February 4, 2021, at 1:30 p.m. in the Presiding District Court (remote), Bexar County, Texas.

SIGNED THIS _____ day of _____, 2021.

JUDGE PRESIDING

CERTIFICATE OF SERVICE

The undersigned hereby certifies on January 22, 2021, a true and correct copy of the foregoing *Notice of Hear* was served on the following known counsel of record in compliance with the Texas Rules of Civil Procedure:

Via E-Service

Germer Beaman & Brown PLLC

Gregg R. Brown

State Bar No. 03219010

grb-svc@germer-austin.com

Austin L. Jones

State Bar No. 24116579

ajones@germer-austin.com

Attorneys for Defendant

/s/Carlos Solis
Carlos A. Solis